

CORRESPONDENCE CONTROL		
OUT-GOING LTR NO		
94 RF 02417		
DIST	TR	INC
BENJAMIN, A.		
BERMAN, H.S.		
BRANCH, D.B.		
CARNIVAL G.I.		
COPP, R.D.		
DAVIS, J.G.		
FERRERA, DW		
HANNE, B.J.		
HARMAN, L.K.		
HALLY, T.J.		
HEDAH, T		
HILBIG, J.G.		
KIRBY, W.A.		
KUESTER, A.W.		
LEE E.M.		
MANN HP	X	
MARX, G.E.		
MCDONALD, M.M.		
MCKENNA, F.G.		
MONTROSE, J.K.		
MORGAN R.V.		
POTTER, G.L.		
PZUTO, V.M.		
RACY, J.H.		
SANDLIN, N.B.		
SPIER, R.L.		
STGER, S.G.	X	
SWART, D.L.		
SVIAN, M.T.		
SIANSON, E.R.		
W. KINSON, R.B.	X	
W. LIAMS, S. (ORC)		
W. SON, J.M.		
WE JO		
BUSBY	X	
HOUK	X	
PRIMROSE	X	
ROBERTS, R	X	
E-V Action Tracking		
F-21	X	X
L&A		
R&M Action Tracking		
E-V Records Center (2)	X	X
Correspondence Control	X	X
CLASSIFICATION		
L VI		
L CLASSIFIED	X	X
C CONFIDENTIAL		
RET		
AUTHORIZED CLASSIFIER SIGNATURE		
ENT CLASSIFICATION REVIEW PER CLASSIFICATION OFFICE		
COPY TO RFP CC NO 00722 RF -94		
ACTION ITEM STATUS		
<input type="checkbox"/> OPEN	<input type="checkbox"/> CL SED	
APPROVALS WS817		
P 26 RZH ZH		
& TYPIST INITIALS		
JMA jlm		
- 69 (rev 9 92)		

Jessie M Roberson
March 3 1994
94 RF 02417
Page 2

The method used in the most recent Remedial Investigation Report is far superior to the purely risk-based approach which EPA is demanding. In fact, Dr. Gilbert himself cautions against blindly following the statistical results and has recommended application of professional judgement. EG&G does not agree with deviating from the current methodology used to determine other contaminants of concern and does not agree that manganese and antimony are OU 1 contaminants.

Impacts

Inclusion of Mn and Sb as new contaminants in the RFI/RI Report would have negative impacts in the near term. Schedule slippage and cost overruns would impact the entire OU 1 project. Initial estimates place the cost variance to the RFI/RI at approximately \$20,000, and delivery of the revised Final RFI/RI Report would be delayed to at least April 1, 1994.

More importantly, allowing Mn and Sb to be called contaminants would have very grave consequences in the long run. Simply put, Rocky Flats would be required to collect and treat groundwater for metals which are naturally occurring. This treatment could go on for decades at a tremendous cost.

This issue has stopped work on the CMS/FS. The Technical Memorandum (TM)10 - Remedial Action Objectives cannot continue until the contaminant list is finalized. In fact, work already completed would have to be redone. Furthermore, the remainder of the FS cannot begin since it is dependent on the results of TM 10. EG&G is still assessing the cost and schedule impacts to the FS.

Provisions are being investigated in the Risk Assessment Guidance for Superfund by which EG&G might comply with the intent of EPA's wishes to include Mn and Sb but refer to them as naturally occurring or anthropogenic instead of contaminants. EG&G will inform DOE on the progress of this investigation.

Please contact R. Zeke Houk at extension 8714 with any comments.



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RZH:jlm

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